



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/NJM/SKW
F. #2015R01171

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 5, 2023

By ECF and Email

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Kaveh Lotfolah Afrasiabi
Criminal Docket No. 21-46 (BMC)

Dear Judge Cogan:

The government respectfully writes to advise the Court of the parties' joint request for an adjournment of trial.

The government expects to file a brief pursuant to the Classified Information Procedures Act ("CIPA"), 18 U.S.C. app. 3, no later than July 3, 2023 or by a date set by the Court.¹ The government is prepared to proceed to trial anytime thereafter, although we respectfully request that the Court not schedule the trial to begin the weeks of August 21, August 25, or September 4, 2023.

Standby counsel for the defendant advises that she has trial conflicts in May, June, July, September, and late October.²

¹ The government expects to file a motion regarding this anticipated brief pursuant to CIPA § 2 shortly.

² Specifically, counsel has advised that she has the following trials scheduled, with additional information available upon request.

- United States v. Davis, 21-CR-603 (VEC) (S.D.N.Y. May 25) (3 weeks)
- United States v. Manaf, 18-CR-762 (PAC) (S.D.N.Y. June 12) (2 weeks)
- United States v. Bridges, 21-CR-65 (LJL) (S.D.N.Y. July 10) (2 weeks)
- United States v. Hernandez, 15-CR-379 (PKC) (S.D.N.Y. Sept. 18) (1 month)

